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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/4/2005

Time Start 10:00 AM

Time Finish 11:50 AM

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name General Electric Company I.D. Number PAD046558037

Site Address 6901 Elmwood Avenue

County Philadelphia Municipality Philadelphia Zip 19142

Name of Inspector Aleta L. Finney

Name & Title of Responsible Official Hal Heckman, Environmental Health and Safety Manager

Person Interviewed same Telephone (215) 365-7553

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: 0 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☐ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name General Electric Company ID Number PAD046558037 Date 4/4/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name General Electric Company ID Number PAD046558037 Date 4/4/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: General Electric Company

Identification Number: PAD046558037

Date of Inspection: Friday, April 4, 2003

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity hazardous waste generator inspection. Present from the facility was Hal Heckman, Environmental, Safety and Health Manager.

The facility is in the process of closing, according to Mr. Heckman. He also stated that the facility is expected to close by sometime in May. Mr. Heckman did not yet want to close the facility's EPA ID# due to the fact that during the closing and ultimate demolition of the facility, they may generate some wastes that are hazardous. During a short tour of the facility, Mr. Heckman showed me the former hazardous waste storage area. It has since been "closed" by the facility: all wastes have been removed and the area had been powerwashed. There are also several other areas that had been powerwashed around the facility. This water has been collected onsite in tanks and drums and is lab tested for any hazardous constituents. There were some of these wastes located inside of the facility at the time of the inspection. According to Mr. Heckman and a GE consultant, the waste is not hazardous. All drums were labeled as non-hazardous waste, the type of waste contained within the drum as well as the accumulation date. The building was observed to be clean. At the time of the inspection, the facility was doing some asbestos abatement.

During this inspection, Mr. Heckman and myself agreed upon doing a final closure inspection, once he was sure that the facility would not be generating any more hazardous wastes.

No violations were observed.

The results of this inspection were reviewed with Mr. Heckman before leaving the facility. A copy of this report was left with Mr. Heckman on April 11, 2003.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

Hal Heckman

Date

4/11/2003

Inspector Signature)

Aleta L. Finney

Date

4/11/2003

File name: General Electric-rpt

Page *4* of *4*



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/13/2002

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ **GENERATOR** ☐ **S Q GENERATOR**

Company name General Electric Company I.D. Number PAD046558037
 Site Address 6901 Elmwood Avenue
 County Philadelphia Municipality Philadelphia Zip 19142
 Name of Inspector Michelle Milburn
 Name & Title of Responsible Official Hal Heckman, EHS
 Person Interviewed Hal Heckman Telephone (215) 726-2626
 Mailing Address (if different from above) same
 Amount of Hazardous Waste Generated per Month: ~600 Pounds _____ Kgs

1. Site Characterization:STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types fluorescent lamps, batteries**3. Hazardous Waste Transporters:**Transporter Name Safety Kleen License Number PA-AH 0172Transporter Name Clean Harbors License Number PA-AH 0312Transporter Name Maumee Express License Number PA-AH 0420**4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
D039	Petroleum Naphtha	Safety Kleen West Chester, PA PAD000738849
F005/F003	Waste Paint Related Material	Safety Kleen Dolton, IL ILD980213913
F003	Waste Paint related material	Clean Harbors Baltimore, MD MD0980555189
D002	Corrosive Liquid	
F005	Waste Flammable Solids	Spring Grove Resource Recovery Cincinnati, OH OHID000816629
D008	Lead	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name General Electric Co. ID Number PADO46558037 Date 3/13/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name General Electric ID Number PAD040558037 Date 3/13/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/13/2002 Identification Number PAD046558037Company/Facility/Site Name General Electric Company

A follow-up large quantity hazardous waste generator inspection was conducted by Michelle Milburn, Waste Management Specialist, with the PADEP. Present for the facility was Hal Heckman.

The facility's Waste minimization Plan was reviewed. The Plan is complete and up-to-date.

During the previous inspection of March 5, 2002, one violation was cited:

Line HO20: 25 PA Code Chapter 262a.100

Lack of Source Reduction Strategy

This violation has been corrected.

No new violations cited.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Hal HeckmanDate 3/13/2002Inspector (signature) Michelle Milburn



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/5/2002Time Start 9:45 Am

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name General Electric Company I.D. Number PAD046558037Site Address 6901 Elmwood AvenueCounty Philadelphia Municipality Philadelphia Zip 19142Name of Inspector Michelle MilburnName & Title of Responsible Official Hal Heckman, EHSPerson Interviewed Hal Heckman Telephone (215) 726-2626Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: ~600 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types fluorescent lamps, batteries

3. Hazardous Waste Transporters:

Transporter Name Safety Kleen License Number PA-AH 0172Transporter Name Clean Harbors License Number PA-AH 0312Transporter Name Maumee Express License Number PA-AH 0420

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
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F005 / F003	Waste Paint related material	Safety Kleen Dolton, IL ILO980613913
F003	Waste Paint related material	Clean Harbors Baltimore, MD MOD 980555129
D002	Corrosive Liquid	
F005	Waste Flammable Solids	Spring Grove Resource Recovery Cincinnati, OH OHD000816629
D008	Lead	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name General Electric Co. ID Number PAD040558037 Date 3/5/2002

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STATUS

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		X		Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/5/2002 Identification Number PAD046558037Company/Facility/Site Name General Electric Company

A large quantity hazardous waste generator inspection was conducted by Michelle Millburn, Waste Management Specialist, with the PADEP. Present for the facility was Hal Heckman.

This facility makes and assembles circuit breakers and electrical cabinets. A facility tour was conducted. The majority of the hazardous wastes are generated in the painting areas. At one of the paint booths there is an accumulation container for paint wastes. This container was labeled and kept closed. Each of the paint booths also has a spray gun cleaning booth that is serviced by Safety Kleen. All other hazardous wastes are stored in the main storage area. At the time of the inspection there were no drums of hazardous wastes in the storage area. There were a few drums of residual waste; all were labeled. The storage area has secondary containment. Spill response equipment is stored next to the storage area. Weekly inspections of the storage area are conducted. Inspection logs were available and were found to be up-to-date.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Hal Heckman Date 3/5/2002Inspector (signature) Michelle Millburn

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/5/2002 Identification Number PAD046558037Company/Facility/Site Name General Electric Company

Manifests for the past year were reviewed. The proper copies are present and the manifests appear to be fully completed. The facility's PPC Plan was reviewed and is very thorough. The plan was last updated in 2001. Employee training is conducted annually. A training summary was available as well as training certificates from 2001. The 2001 Biennial Report was submitted. A copy was available for review. Mr. Heckman could not locate the Source Reduction Strategy during the inspection, but he stated that the facility does have source reduction and waste minimization policies in place.

One Violation was observed:

Line H020: 25 PA Code Chapter 262a.100

lack of Source Reduction Strategy available

A follow-up inspection will be conducted.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Hal Heckman

Date

3/5/2002

Inspector (signature)

Michelle Millburn



*Specialty Breaker Business
General Electric Company
6901 Elmwood Avenue, Philadelphia, PA 19142-1897
215 726-2626*

To: **Mr. Kenneth J. Cox, 3HW100**
United States Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA. 19107

April 11, 1996

From: **Michael R. Fairley, EHS Manager**
General Electric Company
Philadelphia Operation
6901 Elmwood Avenue
Philadelphia, PA. 19142

Re: **Response to RCRA Compliance Evaluation Inspection Findings**

Dear **Mr. Kenneth J. Cox:**

In response to the letter from your associate, Mr. Christopher Pilla (Chief RCRA Enforcement Branch), received by me on March 25, 1996, I would like to reply to the five "violations and discrepancies" noted:

1) The 55 gallon drum that was found "open and unattended" in the < 90 storage area was in fact left open by the attendant, who had walked away, a distance of 30 feet, to assist a co-worker loading another drum on to a pallet. The process took approximately two minutes, whereupon the attendant returned to the drum, to continue work. The point I would like to make is that this is a very unusual action for the HAZMAT trained attendant to do. He is highly trained in this area, and is aware of the fact that the drum lid must be placed back on the drum, whenever he is not actively engaged in filling the drum. It is not standard practice for this employee, or any other GE employee, to leave hazardous materials without a proper lid or cover. This was in fact, a rare oversight. The employee was immediately acutely aware of his mistake, and is very unlikely to make a mistake of this kind again. As you remember, he immediately apologized to you and me for his oversight, as he takes his duties very seriously.

2) A crack was noted in the concrete sidewall of the depressed driveway where drums are stored for shipment. This is our < 90 hazardous waste storage area, where, in April of 1995, we poured ten inches of fresh concrete, at a cost of \$16,000, over an already existing base of 10 inch solid concrete, to upgrade the level of containment in this area. The crack you noted was from the settling of the concrete and has now been sealed with concrete-compatible-epoxy. The area will be inspected on a weekly basis for any further concrete settling cracks.

3) The inconsistencies cited in the report supplied by Clean Harbors Environmental Services, Inc., regarded the incomplete listing of our active waste profiles with Clean Harbors. Pursuant to Clean Harbors response letter dated February 2, 1996, you will note that as Profile #U49615 (for paint solids) expired on October 31, 1995, I utilized a new Profile #U12789, for shipment of paint wastes. A complete review of all my manifests shows that I did not ship any material under profile #U49615, after it's expiration date. The reason the #U12789 active profile was not included in the Clean Harbors report of active waste profiles, is that it is not unique to the Philadelphia Operation plant. It is in fact a generic profile that is utilized by several GE sites in the region that produce a standard variety of paints and thinner waste from painting processes. It was an oversight on the part of the Clean Harbor's technician generating the report not to include active generic profiles utilized by the Philadelphia Operation. Clean Harbors has GE Corporate approval to remove, transport and dispose of hazardous waste from GE facilities. Clean Harbors is the prime vendor for removal of all hazardous wastes from Philadelphia Operations.

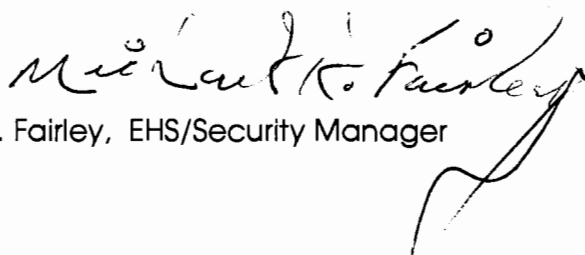
4) Job descriptions of persons generating or handling hazardous waste were not complete. I have now updated the job descriptions of our painters who generate hazardous waste (waste paints and thinners) in accordance with 40 CFR 265.16. The annual RCRA training is presently scheduled for May 1996, for all affected employees.

5) I have updated the emergency coordinators list in accordance with 40 CFR 265.52(d). The need for the updating of the list was due to plant wide layoffs.

I would like to thank you and your associate, Ronald Jones (Environmental Protection Specialist) for your kind assistance during the Evaluation Inspection. I found your advise, direction and interpretation of the regulations extremely helpful in such areas as: hazardous waste storage areas at point of generation, pouring-off operations, recordkeeping, training, and suggested improvements to my hazardous waste storage areas, as well as making sure that I was in compliance in all areas according to the regulations. I found your evaluation inspection to be just that: a professional and helpful process whereby government officials assist industry in assuring successful compliance. Additionally, the information you sent concerning reference for Pollution Prevention / Waste Minimization was very helpful in providing ideas with which to expand my own Pollution Prevention Program.

Thank you for your assistance and please feel free to contact me for any additional information you may need.

Sincerely,



Michael R. Fairley, EHS/Security Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building

Philadelphia, Pennsylvania 19107-4431

MAR 21 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael R. Farley, Manager
Environmental Health and Safety
G.E. Philadelphia Operations
6901 Elmwood Avenue
Philadelphia, PA. 19142

Dear Mr. Farley:

The U.S. Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI) at the Philadelphia Operations facility on January 30, 1996. Enclosed is a copy of the inspection report.

The Office of the Resource Conservation and Recovery Act (RCRA) Programs has reviewed the findings of the inspection with respect to the rules and regulations set forth in the Code of Federal Regulations (CFR), Title 40, Parts 260 through 299 and Pennsylvania Code, Title 25, Chapters 260 through 270 which govern the handling and management of Solid and Hazardous Wastes. The following violations and discrepancies were noted:

1. A 55 gallon drum was left open and unattended in the <90 day storage area (40 CFR 265.173(a)),
2. A crack was found in the sidewall of the depressed driveway where drums are stored for shipment,
3. There were inconsistencies cited in the records supplied by Clean Harbors,
4. Training records did not contain the required job descriptions and training requirements (40 CFR 265.16), and
5. The emergency coordinators list needs to be updated (40 CFR 265.52(d))

EPA requests that you review the enclosed inspection report and respond to the deficiencies noted above and to the conditions and/or concerns contrary to the RCRA requirements identified at the time of the inspection. Please submit a written response to EPA within thirty (30) calendar days of receipt of this letter to:

Kenneth J. Cox 3HW100
Environmental Protection Agency
841 Chestnut Street
Philadelphia, PA 19107

Along with a copy of the inspection report I am enclosing a list of EPA publications that you may find of use in your ongoing Pollution Prevention /Waste Minimization efforts. If you have any questions or comments, please contact Ken Cox by phone at (215) 597-6413 or by FAX at (215) 597-8174.

Sincerely,



Christopher Pilla, Chief
RCRA Enforcement Branch

Enclosures

cc: Nancy Roncetti (PADEP) w/enclosure
Kenneth J. Cox 3HW100 w/o enclosure
File w/enclosure ✓

GENERAL ELECTRIC

BREAKER BUSINESS SECTION

GENERAL ELECTRIC COMPANY • 6901 ELMWOOD AVENUE • PHILADELPHIA, PENNSYLVANIA 19142 • (215) 726-2626

August 6, 1984

Mr. Lawrence H. Lusk
Solid Waste Facilities Supervisor
D.E.R.
1875 New hope Street
Norristown, Pa. 19401

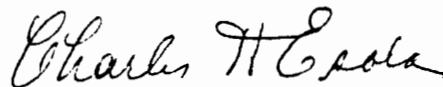
Dear Mr. Lusk:

Enclosed please find forms to obtain permit by rule status as per your letter of 8/2/84.

We have recently installed a conventional electroplating waste water treatment system which reduces chromates, destroys cyanides, precipitates heavy metal and controls pH to the P.O.T.W., City of Philadelphia.

We hope this meets with your approval. I may be contacted on - 215 - 726-2128/2425.

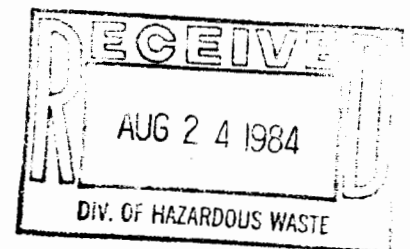
Sincerely,



C. H. Esola
Sr. Adv. Mfg. Proj. Engr

CHE:emk
Attachment

cc: Mr. Leon Kuchinski
Acting Director
Division of Hazardous Waste
P. O. Box 2063
Harrisburg, Pa. 17120



BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I. INSTALLATION'S EPA I.D. NUMBER									
P	A	D	0	4	6	5	5	8	0
II. NAME OF INSTALLATION									
General Electric Company									
III. INSTALLATION MAILING ADDRESS									
STREET OR P.O. BOX									
6901 Elmwood Avenue									
CITY OR TOWN								ST.	ZIP CODE
Philadelphia								PA	19142
IV. LOCATION OF INSTALLATION									
STREET OR ROUTE NUMBER								MUNICIPALITY	
Same									
CITY OR TOWN						ST.	ZIP CODE	COUNTY	
Same									
V. INSTALLATION CONTACT									
NAME AND TITLE (last, first, & job title)								PHONE NO. (area code & no.)	
Esola Charles H Sr. Adv. Mfg. Proj. Eng.								215 726 212	
VI. OWNERSHIP									
A. NAME OF INSTALLATION'S LEGAL OWNER									
General Electric Co.									
B. TYPE OF OWNERSHIP									
(enter the appropriate letter into box)									
F = FEDERAL M = NON-FEDERAL M									
VII. SIC CODES (4-digit in order of priority)									
A. FIRST					C. THIRD				
3613 (specify)									
B. SECOND					D. FOURTH				
VIII. TYPE OF HAZARDOUS WASTE ACTIVITY									
<input type="checkbox"/> A. GENERATION		<input type="checkbox"/> C. STORE		<input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX)		<input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM			
<input type="checkbox"/> B. TREAT		<input type="checkbox"/> D. DISPOSE		<input checked="" type="checkbox"/> F. PERMIT BY RULE		<input type="checkbox"/> H. OTHER (specify):			
IX. MODE OF TRANSPORTATION (transporters only)									
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):									
X. EXISTING ENVIRONMENTAL PROGRAM PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
					STACK LICENSES				
B. UIC (Underground Injection of Fluids)					E. SOLID WASTE				
C. RCRA (Hazardous Wastes)					F. OTHER				
XI. TYPE OF NOTIFICATION									
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).									
<input type="checkbox"/> A. FIRST NOTIFICATION			<input type="checkbox"/> C. DELETION OF A WASTE			<input type="checkbox"/> E. DELETION OF AN ACTIVITY			
<input type="checkbox"/> B. CHANGE OF GENERAL INFORMATION			<input type="checkbox"/> D. ADDITION OF A WASTE			<input checked="" type="checkbox"/> F. ADDITION OF AN ACTIVITY			

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 8	2 F 0 0 9	3 F 0 1 9	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 6 2	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 0 2 9	32 P 0 9 8	33 P 0 9 9	34 P 1 0 6	35 P 1 2 1	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EXTREMELY TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

R. H. Miller

NAME and OFFICIAL TITLE (Type or Print)

HGR. ENGINEERING & QUALITY CONTROL

DATE SIGNED

8/20/84

FOR OFFICIAL USE ONLY

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 270-1920

April 6, 1984

940 04 653 800

Mr. C. H. Esola
RCRA Coordinator
General Electric Company
6901 Elmwood Avenue
Philadelphia, PA 19142

Re: Hazardous Waste Drum Storage
Closure Plan

Dear Mr. Esola:

The subject closure plan has been reviewed by our technical staff and found to be acceptable. Your attention is invited to paragraph 75.265(o) of the Pennsylvania Hazardous Waste Rules and Regulations concerning closure and post closure, especially those areas dealing with time constraints. Upon completion of all closure activities, please complete the attached certifications and forward them to this office.

If you have any questions, please feel free to contact me at 270-1911.

Very truly yours,

JAMES A. DOLAN
Hazardous Waste Coordinator

cc: Division of Hazardous Waste Management
US EPA Code 3AW32
Field Supervisors
Re 30 4W 097.1

ATTACHMENT

DESK MEMORANDUM

SUBJECT

GE/SAD Closure Plan - 6701 Elmwood Ave, Phila
PAD 046558037

TO

Jim Dolan

FROM

Rob Zeng

DATE SENT

1/26/84

DATE NEEDED

PLEASE CALL:	APPROVAL	SEE ME
RETURNED YOUR CALL	AS REQUESTED	COMMENT
INFORMATION	PREPARE REPLY/REPORT	NOTE AND FILE

RECEIVED BY

DATE

TIME

ROUTE	INITIAL	DATE	ROUTE	INITIAL	DATE

MESSAGE

These are copies of
GE's closure plan.
It only covers containers (soil)
storage, and not
tank treatment (Toi) -

see attached Part A info.
(A. joint Oronskan-Zeng visit)
inspection is needed here ASAP.
over →

Their tank treatment
may or may not
be covered under
permit-by-rule.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 270-1920



March 29, 1984

Mr. James H. Rizzo
Manager
Shop and Services
General Electric Company
High Power Laboratory
7500 Lindberg Boulevard
Philadelphia, PA 19153

Re: Identification No. PAD075527804

Dear Mr. Rizzo:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sewer authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at the above number.

Very truly yours,

LAWRENCE H. LUNSIK
Solid Waste Facilities Supervisor

cc: Philadelphia Health Department
Division of Hazardous Waste Management
U.S. EPA Code 3AW32
Field Supervisor
Re 30 1W 89.10

Hazardous Waste Inspection Report
TSD Facilities - Part ADate of inspection 08/16/91 Time start _____ Time finish _____Name of inspector Dirk RobinsonCompany, installation name GE - Switch Gear Plant (Breaker Plant)Location 6901 Edwood AveCounty _____ Municipality PhilaIdentification number PAD046558037Name of responsible official John WyszczanskiTitle Maintenance Engineer of ENV. OperationsMailing address SAMEArea code and telephone number (215) 726-3072Name of person interviewed " "Title " "Mailing address (if different from above) " "Area code and telephone number " "

1. Site characterization:

- | | | | | | |
|----|--------------------------------------|---|-----------------------------------|---|--|
| a. | <input type="checkbox"/> Treatment - | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> chemical | <input type="checkbox"/> physical | <input type="checkbox"/> biological |
| b. | <input type="checkbox"/> Storage - | <input type="checkbox"/> containers | <input type="checkbox"/> tanks | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> waste piles |
| c. | <input type="checkbox"/> Disposal - | <input type="checkbox"/> land treatment | <input type="checkbox"/> landfill | <input type="checkbox"/> incineration | <input type="checkbox"/> thermal treatment |
| d. | <input type="checkbox"/> Use | <input type="checkbox"/> reuse | <input type="checkbox"/> recycle | <input type="checkbox"/> reclaim | |

2. Does the facility generate hazardous wastes? ☐ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☐ No

Inspection Report Comments

Date of Inspection

08/16/91

Identification Number

RAD046558037

Company/Facility/Site Name

G.E. - Switch Gear Plant (Breaker Plant)

Comments:

This facility is no longer operating as a "55D" facility. A large quantity inspection has been made.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification (Notice of Violation) of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

John Wyszogorski

Date

09/16/91

Inspector (signature)

Dick K. Hobbs

Date

09/16/91

Page 2 of 2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 631-2420



October 28, 1983

Mr. Charles Esola
General Electric Corporation
6901 Elmwood Avenue
Philadelphia, PA 19142

Re: Identification No. PADO46558037

Dear Mr. Esola:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sewer authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at 631-2420.

Very truly yours,

LAWRENCE H. LUNSK
Solid Waste Facilities Supervisor

cc: Philadelphia Health Department
US EPA (3AW32)
Division of Hazardous Waste Management
Re 30 FR5-62

GENERAL ELECTRIC

BREAKER BUSINESS SECTION

GENERAL ELECTRIC COMPANY • 6901 ELMWOOD AVENUE • PHILADELPHIA, PENNSYLVANIA 19142 • (215) 726-2626

June 6, 1983

Mr. Lawrence Lusk
Commonwealth of Pennsylvania
Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

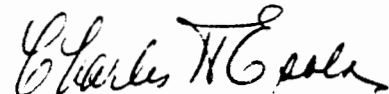
Dear Mr. Lusk:

Since November, 1980 the General Electric Co. Philadelphia Plant, located at 6901 Elmwood Ave., has been operating under Part A of the RCRA Interim Permit. Hazardous waste has been stored in steel containers awaiting a load of 80 drums for a more economical shipment to approved disposer sites. During this same time period we have consolidated our operations into a much smaller and more efficient business. This consolidation effort has led to a significant decrease in the generation of hazardous waste; we estimate 2-3 drums per month. We are negotiating with approved transporters to ship our waste in small lots starting in September, thereby disposing of the materials within a 90-day storage period. This will negate our need to file Part B of the permit under Hazardous Waste Management Regulations 25, Pa. Code Chapter 75, Subchapter D.

We hope this decision meets with your approval and invite you to discuss this plan and inspect the premises at your convenience to assure the Commonwealth of our conformance to this 90-day storage schedule after Part A of the permit expires September 1st.

I may be contacted on (215)-726-2128.

Very truly yours,



Charles H. Esola
Sr. Adv. Mfg. Proj. Engr.
RCRA Coordinator
EPA-PAD-046558037

Attachments:

- A - Form ER-SWM-53: Rev. 3/82
- B - Hazardous Waste Closure Plan (4)
- C - Stack Licenses



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420



February 25, 1983

Mr. Charles Esola
General Electric Company
6901 Elmwood Avenue
Philadelphia, PA 19142

Re: EPA Identification No. PAD 046558037
Facility Name: General Electric Company
6901 Elmwood Avenue
Philadelphia, PA 19142

Dear Mr. Esola:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referred above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than September 1, 1983. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

If your facility is not a TSD (treatment, storage or disposal site), or if you stopped functioning as a TSD facility after November 19, 1980, or if you qualify under the Permit by Rule provision of the regulations, it will be necessary for you to contact one of our field offices, and to arrange for an inspection to confirm this. Our field offices and the areas covered are the Bethlehem Office, phone number 861-2070, covering Berks, Lehigh and Northampton Counties; and the Norristown Office, phone number 631-2420, covering Philadelphia, Bucks, Chester, Delaware and Montgomery Counties.

If you functioned as a TSD after November 19, 1980, it will be necessary for you to submit four copies of a closure plan to Mr. Bruce Beitler of this office.

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact Mr. Lawrence H. Lunsk, Solid Waste Facilities Supervisor, at the letterhead address, or by calling 215 631-2420.

Very truly yours,

WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE